

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO	§	
ENTERO, et al.,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	CASE NO. 5:21-cv-844-XR
	§	
GREGORY W. ABBOTT, et	§	
al.,	§	
	§	
Defendants.	§	

OCA-GREATER HOUSTON, et	§	
al.,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	CASE NO.1:21-cv-780-XR
	§	
JOHN SCOTT, et al.,	§	
	§	
Defendants.	§	

HOUSTON JUSTICE, et al.,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	CASE NO.5:21-cv-848-XR
	§	
GREGORY WAYNE ABBOTT, et	§	
al.,	§	
	§	
Defendants.	§	

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LULAC TEXAS, et al., §
 Plaintiffs, §
 vs. § CASE NO. 1:21-cv-0786-XR
 JOHN SCOTT, et al., §
 Defendants. §

MI FAMILIA VOTA, et al., §
 Plaintiffs, §
 vs. § CASE NO. 5:21-cv-0920-XR
 GREG ABBOTT, et al., §
 Defendants. §

UNITED STATES OF AMERICA, §
 Plaintiff, §
 vs. § CASE NO. 5:21-cv-1085-XR
 THE STATE OF TEXAS, ET §
 AL., §
 Defendants. §

ORAL VIDEOTAPED DEPOSITION
 CORPORATE REPRESENTATIVE OF
 MI FAMILIA VOTA
 MS. ANGELICA RAZO
 April 5, 2022

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ORAL VIDEOTAPED DEPOSITION OF THE CORPORATE
 REPRESENTATIVE OF MI FAMILIA VOTA, MS. ANGELICA RAZO,
 produced as a witness at the instance of the
 Defendants and duly sworn, was taken in the
 above-styled and numbered cause on the 5th day of
 April, 2022, from 9:52 a.m. to 7:05 p.m., before
 Michelle Hartman, Certified Shorthand Reporter in and
 for the State of Texas and Registered Professional
 Reporter, reported by computerized stenotype machine
 at the offices of Reed Smith LLP, 811 Main Street,
 Suite 1700, Houston, Texas 77002, pursuant to the
 Federal Rules of Civil Procedure and the provisions
 stated on the record or attached hereto.

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1 APPEARANCES
 2 FOR THE PLAINTIFFS MI FAMILIA VOTA, et al.:
 3 Mr. Bradley Prowant
 4 Ms. Wendy Olson (via Zoom)
 5 and Mr. Elijah Watkins (via Zoom)
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 12 FOR THE STATE DEFENDANTS:
 13 Mr. Eric A. Hudson
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 19 FOR THE HAUL PLAINTIFFS:
 20 Mr. Kenneth E. Broughton (via Zoom)
 21 and Ms. Sarah Stewart (Zoom)
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 FOR THE DEFENDANT HIDALGO COUNTY DISTRICT ATTORNEY
 RICARDO RODRIGUEZ, JR.:
 Ms. Jacqueline Villarreal (via Zoom)
 and Mr. V.M. Garza
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1 APPEARANCES (Cont.)
 2 FOR THE U.S. DEPARTMENT OF JUSTICE:
 3 Mr. Michael E. Stewart (via Zoom)
 4 U.S. Department of Justice
 5 JENNER & BLOCK LLP
 6 1099 New York Avenue NW
 7 Washington, D.C. 20001
 8 Telephone: 202-639-6000
 9 ALSO PRESENT:
 10 Mr. Terry Harrison, videographer
 11 Ms. Amy Frieder, US DOJ (Zoom)
 12 Mr. Camryn Pak, US DOJ (Zoom)
 13 Ms. Courtney Hostetler, Free Speech For The
 14 People (Zoom)

2 (Pages 2 to 5)

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1 Rocha are filling in Ms. Hidalgo about what's going
2 on?

3 A. I do not know.

4 Q. What is the elections advisory council
5 supposed to do?

6 A. To serve as a community member based
7 advisory council that can support the
8 administration's office, making sure that they are
9 providing increased access to -- equitable access to
10 the ballot box during elections days.

11 Q. What does that mean?

12 A. That means if any issues arise, that
13 there is an advisory council that can provide
14 feedback to any election plans before they are -- to
15 any election plans before they are sent to approval
16 by Harris County Commissioners Court and then after
17 election, do a debrief.

18 Q. So --

19 A. The bylaws are being written out as we
20 speak.

21 (Court reporter asks for clarification).

22 Q. (BY MR. HUDSON) Are you saying written
23 out or written now?

24 A. Written out. They are still in
25 discussion.

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1 Q. What other organizations are part of
2 this community council?

3 A. The community council is not formed
4 yet. There's just discussions to form one.

5 Q. What organizations are a part of
6 Houston in Action?

7 A. There's several organizations. More
8 than I can list.

9 Q. Tell me the ones you can list.

10 A. Pertaining to the election advisory
11 council or Houston in Action in general?

12 Q. Well, let's talk about Houston in
13 Action first.

14 A. Mi Familial Vota's part of it. Other
15 civic engagement organizations, such as OCA Greater
16 Houston, NALEO, which is the National Association of
17 Latino Elected Officials, Baker Ripley, Jolt Texas,
18 League of Women Voters, Engage Texas, East Houston
19 Empowerment Center, maybe -- I forgot the name.
20 That's all I recall at the moment.

21 Q. And which of these are involved in the
22 elections council advisory?

23 A. Did I mention the Houston Area Urban
24 League?

25 Q. No.

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1 A. Houston Area Urban League.

2 Q. Are all these groups that you just
3 identified part of the discussions about forming an
4 elections advisory council?

5 A. No.

6 Q. Which ones of the ones that you just
7 listed are involved?

8 A. That I recall, the Houston Urban Area
9 League.

10 Q. Any others?

11 A. I believe Move Texas is also part of
12 those conversations.

13 Q. Any other groups?

14 A. Not that I can recall at the moment.

15 Q. How often does the group meet on the
16 elections advisory council?

17 A. Very sparsely due to other priorities.

18 Q. How many times to your knowledge has it
19 met in 2022?

20 A. Once.

21 Q. Did any of the discussions that you've
22 been a part of with regard to the elections advisory
23 counsel center on Senate Bill 1?

24 A. No.

25 Q. Could you describe for the Court what

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1 equitable access is in the context of voting?

2 A. Ensuring that the demographic of voters
3 that exist in Harris County and the livelihoods that
4 they have, that we have election systems that make it
5 easy for them to access voting either vote by mail,
6 voting in person, voting early, voting on election
7 day.

8 Q. What kind of voters need those options
9 from Mi Familia Vota's perspective?

10 A. We have several community members that
11 work nontraditional work hours. So, for example,
12 7:00 a.m. to 7:00 p.m. voting hours might not
13 necessarily fit their work schedule.

14 Q. Can you give me an example of the kind
15 of worker you're talking about?

16 A. Yes. For example, truck drivers that
17 reside in Harris County, that's an example. Also,
18 our medical staff.

19 Q. So doctors?

20 A. Health professionals in general.

21 Q. What about plant workers?

22 A. Can you elaborate?

23 Q. Sure. So in Baytown we have Chevron,
24 Shell, Bayer, Exxon, the list goes on, and they work
25 shift work. So it's 24 hours around the clock,

25 (Pages 94 to 97)

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1 subpoenaing specific legislators.

2 Q. Has Mi Familia Vota retained any
3 experts to speak to intentional discrimination?

4 A. I believe so.

5 Q. Any other efforts that you're aware of
6 that Mi Familia Vota is making to discover
7 intentional discrimination?

8 A. I believe there are efforts to -- that
9 rely on experts to have information around the
10 disproportionate impact and voting -- that S.B.1
11 would have on the community.

12 Q. So just clearing up a bit about your
13 specific community, because there were questions
14 about your community versus others.

15 Are you aware of what the Latino voter
16 turnout was in the 2020 general election?

17 A. It was higher than previous elections.

18 Q. Was it a record election?

19 A. Yes.

20 Q. Record turnout?

21 A. Yes, substantially higher, particularly
22 during early voting.

23 Q. Are there provisions in S.B. 1 -- are
24 you aware of why there was a record voter turnout for
25 Latino voters?

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1 A. Yeah, well, we hear from community
2 members, particularly in Harris County, is that you
3 see methods like drive-thru voting, 24-hour voting,
4 those were methods that had -- they had never used
5 before that were implemented in the 2020 election,
6 and community members liked using that. It was
7 convenient for them to use it. It was time
8 convenient -- it was also less time consuming than
9 other regular voting practices and it was accessible,
10 and so I -- we think that that contributed to an
11 increase in voter turnout from our Latino community.

12 Q. Are those processes that you've
13 identified as contributing potentially to the record
14 voter turnout in 2020 addressed by S.B. 1?

15 A. S.B. 1 limits or prohibits several of
16 those different voting methods that were implemented
17 in 2020.

18 Q. And do you believe that's going to have
19 an impact on the Latino vote in the future?

20 A. Yes.

21 MR. HUDSON: Objection: Form; calls
22 for speculation.

23 MR. PROWANT: I don't have any other
24 questions.

25 MR. HUDSON: Yeah, I have just got a

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1 couple of follow-ups.

2 FURTHER EXAMINATION

3 Q. (BY MR. HUDSON) Okay. You had
4 indicated that your attorney team is conducting
5 discovery to find evidence of discrimination; is that
6 right?

7 A. Yes.

8 Q. So as you sit here today, did you
9 answer truthfully when you said you had no evidence
10 of intentional discrimination?

11 A. I answered truthfully when I said I
12 have no evidence.

13 Q. Did you answer truthfully to all of my
14 other questions today?

15 A. Yes.

16 Q. So your attorney team hopes to find
17 some evidence of intentional discrimination through
18 either statistical evidence by your expert witnesses,
19 which have been designated, or I suppose by finding
20 documents from legislators, but as we sit here today,
21 you don't have any, right?

22 MR. PROWANT: Objection: Form.

23 THE WITNESS: Correct.

24 MR. HUDSON: We will reserve.

25 MR. PROWANT: And we will review and

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1 sign.

2 THE VIDEOGRAPHER: Off the record.
3 The time is 7:05.
4 (Proceedings concluded at 7:05 p.m.)
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